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Attorneys for Proposed Intervenor
CALIFORNIA FARM BUREAU FEDERATION;
IDAHO FARM BUREAU FEDERATION;
OREGON FARM BUREAU;
UTAH FARM BUREAU FEDERATION;
WASHINGTON FARM BUREAU;
WYOMING FARM BUREAU FEDERATION;
HENRY GIACOMINI; and
HANNAH TANGEMAN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WESTERN WATERSHEDS PROJECT, et al.

Plaintiffs,

v.

UNITED STATES FOREST SERVICE.

Defendants.

CALIFORNIA CATTLEMEN'S ASSOCIATION;
IDAHO CATTLEMEN'S ASSOCIATION;
WASHINGTON CATTLEMEN'S ASSOCIATION;
OREGON CATTLEMEN'S ASSOCIATION;
WYOMING STOCK GROWER'S ASSOCIATION;
UTAH CATTLEMEN'S ASSOCIATION;
CALIFORNIA WOOLGROWER'S;
ASSOCIATION; COLORADO WOOLGROWERS
ASSOCIATION; and the PUBLIC LANDS
COUNCIL,

Intervenor.

Case No.: 08-cv-1460 PJH

STIPULATION FOR INTERVENTION; and
(Proposed) ORDER THEREON

Last Heard: 10-1-08
Time: 9:30 a.m.
Dept: 3
Judge: Hon. Phyllis J. Hamilton

2nd Amended Complaint filed: 8-06-08

1 WHEREAS, California Farm Bureau Federation, Idaho Farm Bureau Federation, Oregon
2 Farm Bureau, Utah Farm Bureau Federation, Washington Farm Bureau, Wyoming Farm Bureau
3 Federation, Henry Giacomini, and Hannah Tangeman (collectively "Farm Bureau Parties") intend to
4 file a motion to intervene in this case as Defendant-Intervenors, and the parties in this case herein
5 agree to not oppose said motion to intervene of the Farm Bureau Parties in accordance with the terms
6 of this stipulation;

7 WHEREAS, the Farm Bureau Parties propose and agree that their intervention in this case can
8 be limited to the remedial aspects of the case;

9 WHEREAS, Plaintiffs Western Watersheds Project, *et al.* ("Plaintiffs"), defendant United
10 States Forest Service ("Defendant"), and the existing intervenors California Cattlemen's Association,
11 *et al.* ("CCA") propose and agree that the Farm Bureau Parties should be granted such limited
12 intervention in this case;

13 NOW, THEREFORE, it is hereby stipulated by and between Farm Bureau Parties, Plaintiffs,
14 Defendant and CCA, through their respective counsel, as follows:

15 1. Farm Bureau Parties shall be granted intervention in this action, but with such
16 intervention limited to the remedial aspects of the litigation should the Defendant be found liable.

17 2. Farm Bureau Parties shall be represented by the same lawyer and speak with one voice
18 in briefs and in court. Moreover, prior to filing any brief or appearing in court, Farm Bureau Parties
19 shall coordinate with CCA so as not to duplicate arguments.

20 3. Plaintiffs, Defendant and CCA do not oppose the motion.

21 4. Farm Bureau Parties may participate, upon notification by the plaintiffs and defendant,
22 in settlement discussions about remedies even if those discussions precede a determination of
23 liability.

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1 5. This Stipulation may be executed by way of counterpart signatures and/or by way of
2 facsimile signatures.

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4 Dated: August 25 2008

By



JACK L. RICE

Attorney for [Proposed] Intervenors
CALIFORNIA FARM BUREAU FEDERATION;
IDAHO FARM BUREAU FEDERATION;
OREGON FARM BUREAU;
UTAH FARM BUREAU FEDERATION;
WASHINGTON FARM BUREAU
WYOMING FARM BUREAU FEDERATION;
HENRY GIACOMINI; and
HANNAH TANGEMAN

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13 Dated: August 22, 2008

/S/ Executed pursuant Genl. Ord. No. 45, §X(a)

By

KEKER & VAN NEST LLP

JEFFREY R. CHANIN

KLAUS H. HAMM

WARREN A. BRAUNIG

Attorneys for Plaintiffs
WESTERN WATERSHEDS PROJECT;
NATURAL RESOURCES DEFENSE COUNCIL;
CENTER FOR BIOLOGICAL DIVERSITY;
CALIFORNIA TROUT; ENVIRONMENTAL
PROTECTION INFORMATION CENTER;
KLAMATH SISKIYOU WILDLANDS CENTER;
LOS PADRES FOREST LEGACY; SEQUOIA
FORESTKEEPER; GRAND CANYON TRUST;
UTAH ENVIRONMENTAL CONGRESS;
RED ROCK FORESTS; and
OREGON NATURAL DESERT ASSOCIATION.

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25 Dated: August 19, 2008

/S/ Executed pursuant Genl. Ord. No. 45, §X(a)

DAVID BERNARD GLAZER

Attorney for Defendant

UNITED STATES FOREST SERVICE

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1
2 Dated: _____

By _____

WILLIAM J. THOMAS

Attorneys for Defendant Intervenors
CALIFORNIA CATTLEMEN'S ASSOCIATION;
ARIZONA CATTLE GROWER'S ASSOCIATION;
COLORADO CATTLEMEN'S ASSOCIATION;
IDAHO CATTLEMEN'S ASSOCIATION;
WASHINGTON CATTLEMEN'S ASSOCIATION;
OREGON CATTLEMEN'S ASSOCIATION; UTAH
CATTLEMEN'S ASSOCIATION; WYOMING
STOCK GROWERS ASSOCIATION; CALIFORNIA
WOOLGROWERS ASSOCIATION; COLORADO
WOOLGROWERS ASSOCIATION; and
PUBLIC LANDS COUNCIL

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12 **ORDER**

13 The Court, having read and considered the foregoing stipulation, and good cause appearing
14 therefore,

15 **IT IS SO ORDERED.**

16 Dated: _____

17 _____
18 Honorable **PHYLLIS J. HAMILTON**,
19 Judge of the US District Court

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Dated: 9/19/08

By William J. Thomas

WILLIAM J. THOMAS
Attorneys for Defendant Intervenor
CALIFORNIA CATTLEMEN'S ASSOCIATION;
ARIZONA CATTLE GROWER'S ASSOCIATION;
COLORADO CATTLEMEN'S ASSOCIATION;
IDAHO CATTLEMEN'S ASSOCIATION;
WASHINGTON CATTLEMEN'S ASSOCIATION;
OREGON CATTLEMEN'S ASSOCIATION; UTAH
CATTLEMEN'S ASSOCIATION; WYOMING
STOCK GROWERS ASSOCIATION; CALIFORNIA
WOOLGROWERS ASSOCIATION; COLORADO
WOOLGROWERS ASSOCIATION; and
PUBLIC LANDS COUNCIL

ORDER

The Court, having read and considered the foregoing stipulation, and good cause appearing
therefore,

IT IS SO ORDERED.

Dated: _____

Honorable **PHYLLIS J. HAMILTON**,
Judge of the US District Court